



September 17, 1985

TO: John Shauver  
Environmental Enforcement Division

FROM: Bill Shaw  
Surface Water Quality Division

SUBJECT: BASF-Wyandotte, North Works

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SEP 27 1985

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On September 12, 1985, I met with Mr. Keith Fry and other representatives of BASF. The meeting was at BASF's request and they appeared to be trying to make the following points:

1. They proposed and discussed in detail their implementation schedule. (Re: enclosed). Their projections for a fully operational purge system are 18 to 48 months.
2. BASF also proposed their methodology for determining "how clean is clean" (Re: enclosed). Even after two explanations by the company, I'm not sure I understand all the ramifications of their technique.
3. Mr. Fry explained why BASF did not want the consent agreement dovetailed with an NPDES permit:
  - ° No categorical regulations approved and BASF objecting to proposed EPA regulations.
  - ° BASF contesting all their existing permits over standard language.
  - ° BASF objects to any statistical calculation for BPJ.
4. BASF also indicated that they objected to and could not agree to the State (MDNR) exercising review and approval during the schedule.

In summary, BASF's initial position is not very impressive.

cc: S. Schuesler, A.G.'s Office  
R. Schrameck, Detroit District ✓